UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

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(Admissions pro hac vice pending)

PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B Kaplan

APPLICATION FOR DESIGNATION AS COMPLEX CHAPTER 11 CASE

This bankruptcy case was filed on April 4, 2023. The undersigned party in interest believes that this case qualifies under the Court's General Order Authorizing Procedures For Complex Chapter 11 cases, dated March 31, 2003, as a complex Chapter 11 case because: (check those items that are applicable)

- X The Debtor has total liabilities of more than \$1 billion;
- X The Debtor has total assets of more than \$1 billion;
- X There are more than 50,000 creditors in this case;

The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

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	Claims against the Debtor are publicly traded;
	Other: Substantial explanation is required. (Attach additional sheets if necessary.)

Dated: April 4, 2023 WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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